

Federal Defenders
OF NEW YORK, INC.

Southern District
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November 20, 2024

VIA ECF

Honorable Judge Ronnie Abrams
United States District Judge
Southern District of New York
United States Courthouse
40 Foley Square
New York, NY 10007

**Re: United States v. Foster Cooley
22 Cr. 651 (RA)**

Dear Judge Abrams:

I write on behalf of my client Foster Cooley without objection from Assistant United States Attorney Andrew Chan and United States Pretrial Officer Dominique Jackson, to respectfully request that the Court modify the conditions of the bond to release Mr. Cooley's passport to his possession for the purposes of obtaining a visa for future travel with his family to China for his brother's college graduation this summer. It is the defense's understanding that to obtain the Chinese visa, Mr. Cooley will send his passport to the Chinese consulate to apply for the visa. Upon receipt of the Chinese visa and the return of his passport from the Chinese consulate, Mr. Cooley will promptly return his passport to pretrial services.

Mr. Cooley has remained on pretrial supervision since his arrest in 2022. Since then, Mr. Cooley has remained compliant with the terms of his supervised release and has successfully graduated from YAOP. Given Mr. Cooley's history of compliance while under pretrial supervision, the defense requests Mr. Cooley be afforded permission to receive his passport for the purposes of obtaining the Chinese tourist visa and returning it within 24 hours of receipt of the passport and visa.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ 

Marisa K. Cabrera
Assistant Federal Defender
Tel.: (212) 417-8730

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SO ORDERED:



11-21-24

HONORABLE Ronnie Abrams
United States District Judge

cc: Andrew Chan, Esq., Assistant United States Attorney
Dominique Jackson, Pretrial Services Officer